

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Northern Division)

JENNELL BLACK, *et. al.*,

*

Plaintiffs

*

v.

* Civil Action No.: 1:20-cv-03644-CCB

THOMAS WEBSTER, IV, *et al.*

*

Defendants

*

*

* * * * *

**ANSWER TO AMENDED COMPLAINT AND DEMAND FOR JURY TRIAL
BY DEFENDANTS RUSSELL ALEXANDER, M.D. AND
DAVID FOWLER, MB., ChB., IN THEIR INDIVIDUAL CAPACITIES**

Russell Alexander, M.D., and David Fowler, MB., ChB., two of the Defendants, in their individual capacities, by their attorneys, Michael J. Baxter, David J. McManus, and Baxter, Baker, Sidle, Conn & Jones, P.A., pursuant to Rule 12 of the Federal Rules of Civil Procedure, answer the Amended Complaint filed by Plaintiffs as follows:

FIRST DEFENSE

The allegations set forth in the Amended Complaint are barred by the applicable statute of limitations.

SECOND DEFENSE

The conduct of Defendant Russell Alexander, M.D., was reasonable and legally justified.

THIRD DEFENSE

The conduct of Defendant David Fowler, M.B. ChB., was reasonable and legally justified.

FOURTH DEFENSE

Defendants Russell Alexander and David Fowler did not cause or contribute to Anton Black's death, injuries and/or damages, if any.

FIFTH DEFENSE

Defendants Russell Alexander and David Fowler did not act unlawfully or otherwise violate Plaintiffs' rights.

SIXTH DEFENSE

The Amended Complaint fails to state a claim upon which relief may be granted.

SEVENTH DEFENSE

The damages that may be awarded are limited by law.

EIGHTH DEFENSE

Some Plaintiffs lack standing to seek certain damages and/or remedies.

NINTH DEFENSE

Anton Black caused and/or or contributed to his own injuries and/or damages, if any.

TENTH DEFENSE

Defendants Russell Alexander and David Fowler are not liable as alleged.

ELEVENTH DEFENSE

Defendants Russell Alexander and David Fowler are entitled to common law and statutory public official immunity for the state-law claims.

TWELFTH DEFENSE

Defendants Russell Alexander and David Fowler are entitled to qualified immunity as to the federal claims.

THIRTEENTH DEFENSE

Defendants Russell Alexander and David Fowler committed no constitutional violations.

FOURTEENTH DEFENSE

Defendants Russell Alexander and David Fowler are entitled to the privileges, immunities, protections and limits of liability set forth in the Local Government Tort Claims Act as to state claims.

FIFTEENTH DEFENSE

Anton Black's death, and any injuries and/or damages suffered, if any, were caused by third parties, and not attributable to Defendants Russell Alexander and David Fowler.

SIXTEENTH DEFENSE

Defendants Russell Alexander and David Fowler are not liable for punitive damages as a matter of law.

SEVENTEENTH DEFENSE

Defendants Russell Alexander and David Fowler did not act with any malice or gross negligence and therefore are immune from suit in tort for all acts committed within the scope of their public duties under §5-522 of the Courts & Judicial Proceedings Article of the Annotated Code of Maryland.

EIGHTEENTH DEFENSE

Civil conspiracy is not an independently actionable tort separate from the alleged underlying actionable torts.

NINETEENTH DEFENSE

Anton Black assumed the risk of any injuries or damages sustained.

RESPONSES TO SPECIFIC AVERMENTS

INTRODUCTION

1. To the extent any answer is required, the allegations are denied.
2. To the extent any answer is required, the allegations are denied.
3. To the extent any answer is required, the allegations are denied.

JURISDICTION AND VENUE

4. Admitted.
5. Admitted.

NOTICE

6. These Defendants do not have sufficient information to admit or deny the allegations set forth in paragraph 6.

PARTIES

7. These Defendants do not have sufficient information to admit or deny the allegations set forth in paragraph 7.
8. These Defendants do not have sufficient information to admit or deny the allegations set forth in paragraph 8.
9. These Defendants do not have sufficient information to admit or deny the allegations set forth in paragraph 9.
10. These Defendants do not have sufficient information to admit or deny the allegations set forth in paragraph 10.
11. These Defendants do not have sufficient information to admit or deny the allegations set forth in paragraph 11.
12. Admitted, except the second sentence which is denied.
13. These Defendants do not have sufficient information to admit or deny the allegations set forth in paragraph 13.
14. These Defendants do not have sufficient information to admit or deny the allegations set forth in paragraph 14.
15. These Defendants do not have sufficient information to admit or deny the allegations set forth in paragraph 15.
16. These Defendants do not have sufficient information to admit or deny the allegations set forth in paragraph 16.
17. These Defendants do not have sufficient information to admit or deny the allegations set forth in paragraph 17.

18. These Defendants do not have sufficient information to admit or deny the allegations set forth in paragraph 18.
19. These Defendants do not have sufficient information to admit or deny the allegations set forth in paragraph 19.
20. These Defendants do not have sufficient information to admit or deny the allegations set forth in paragraph 20.
21. Admitted as to the first sentence in paragraph 21. Denied as to the remainder of the allegations set forth in paragraph 21.
22. These Defendants do not have sufficient information to admit or deny the allegations set forth in paragraph 22.
23. Admitted as to the first sentence in paragraph 23, except denied as to Defendant Fowler being the final policy maker for the State of Maryland. Denied as to the characterization of the responsibilities of Defendant Fowler in the second sentence in paragraph 23.
24. These Defendants do not have sufficient information to admit or deny the allegations and legal conclusions set forth in paragraph 24.

FACTS COMMON TO ALL COUNTS

25. These Defendants do not have sufficient information to admit or deny the allegations set forth in paragraph 25.
26. These Defendants do not have sufficient information to admit or deny the allegations set forth in paragraph 26.

27. These Defendants do not have sufficient information to admit or deny the allegations set forth in paragraph 27.
28. These Defendants do not have sufficient information to admit or deny the allegations set forth in paragraph 28.
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60. These Defendants do not have sufficient information to admit or deny the allegations set forth in paragraph 60.
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126. These Defendants do not have sufficient information to admit or deny the allegations set forth in paragraph 126.
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137. These Defendants do not have sufficient information to admit or deny the allegations set forth in paragraph 137.
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148. These Defendants do not have sufficient information to admit or deny the allegations set forth in paragraph 148.
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153. These Defendants do not have sufficient information to admit or deny the allegations set forth in paragraph 153.
154. These Defendants do not have sufficient information to admit or deny the allegations set forth in paragraph 154.
155. These Defendants do not have sufficient information to admit or deny the allegations set forth in paragraph 155.
156. These Defendants do not have sufficient information to admit or deny the allegations set forth in paragraph 156.
157. Admitted as to sentence one of paragraph 157. Denied as to the remainder of paragraph 157.
158. These Defendants do not have sufficient information to admit or deny the allegations set forth in paragraph 158.

159. These Defendants do not have sufficient information to admit or deny the allegations set forth in paragraph 159.
160. These Defendants do not have sufficient information to admit or deny the allegations set forth in paragraph 160.
161. These Defendants do not have sufficient information to admit or deny the allegations set forth in paragraph 161.
162. These Defendants do not have sufficient information to admit or deny the allegations set forth in paragraph 162.
163. These Defendants do not have sufficient information to admit or deny the allegations set forth in paragraph 163.
164. Denied.
165. These Defendants do not have sufficient information to admit or deny the allegations set forth in paragraph 165.
166. These Defendants do not have sufficient information to admit or deny the allegations set forth in paragraph 166.
167. These Defendants do not have sufficient information to admit or deny the allegations set forth in paragraph 167.
168. These Defendants do not have sufficient information to admit or deny the allegations set forth in paragraph 168.
169. These Defendants do not have sufficient information to admit or deny the allegations set forth in paragraph 169.

170. These Defendants do not have sufficient information to admit or deny the allegations set forth in paragraph 170.
171. Denied.
172. Denied.
173. Admitted as to the first and second sentences in paragraph 173. Denied as to the remainder of paragraph 173.
174. Denied.
175. Denied.
176. Denied.
177. Denied.
178. These Defendants do not have sufficient information to admit or deny the allegations set forth in paragraph 178.
179. Admitted as to the first sentence in paragraph 179. Denied as to the remainder of paragraph 179.
180. Denied.
181. Denied.
182. Denied.
183. Denied.
184. These Defendants do not have sufficient information to admit or deny the allegations in the first two sentences in paragraph 184. Denied as to the third sentence in paragraph 184.
185. Denied.

186. These Defendants admit that the cited publication includes the quoted language contained in paragraph 186. Denied as to the remainder of paragraph 186.
187. These Defendants admit that the cited publication includes the quoted language contained in paragraph 187. Denied as to the remainder of paragraph 187.
188. Admitted by Defendant Fowler. Defendant Alexander does not have sufficient information to admit or deny the allegations set forth in paragraph 188.
189. These Defendants admit that the cited publication includes the quoted language in paragraph 189. Denied as to the remainder of paragraph 189.
190. Denied.
191. These Defendants deny the allegations contained in the second sentence in paragraph 191. These Defendants do not have sufficient information to admit or deny the other allegations set forth in paragraph 191.
192. Denied.
193. Denied.
194. Denied.
195. Denied.
196. These Defendants do not have sufficient information to admit or deny the allegations set forth in paragraph 196.
197. These Defendants do not have sufficient information to admit or deny the allegations set forth in paragraph 197.
198. These Defendants do not have sufficient information to admit or deny the allegations set forth in paragraph 198.

199. These Defendants do not have sufficient information to admit or deny the allegations set forth in paragraph 199.
200. These Defendants do not have sufficient information to admit or deny the allegations set forth in paragraph 200.
201. These Defendants do not have sufficient information to admit or deny the allegations set forth in paragraph 201.
202. These Defendants do not have sufficient information to admit or deny the allegations set forth in paragraph 202.
203. These Defendants do not have sufficient information to admit or deny the allegations set forth in paragraph 203.
204. These Defendants do not have sufficient information to admit or deny the allegations set forth in paragraph 204.
205. These Defendants do not have sufficient information to admit or deny the allegations set forth in paragraph 205.
206. These Defendants do not have sufficient information to admit or deny the allegations set forth in paragraph 206.
207. These Defendants do not have sufficient information to admit or deny the allegations set forth in paragraph 207.
208. Denied.

COUNT 1

209-217. These Defendants are not a party to this Count and therefore no answer is required to the paragraphs pertaining to it.

COUNT 2

218-223. These Defendants are not a party to this Count and therefore no answer is required to the paragraphs pertaining to it.

COUNT 3

224-239. These Defendants are not a party to this Count and therefore no answer is required to the paragraphs pertaining to it.

COUNT 4

240. These Defendants incorporate by reference the above answers as if fully set forth herein.

241. Denied.

242. Denied.

243. Denied.

244. Denied.

245. Denied.

246. Denied.

COUNT 5

247-251. These Defendants are not a party to this Count and therefore no answer is required to the paragraphs pertaining to it.

COUNT 6

252-257. These Defendants are not a party to this Count and therefore no answer is required to the paragraphs pertaining to it.

COUNT 7

258-264. These Defendants are not a party to this Count and therefore no answer is required to the paragraphs pertaining to it.

COUNT 8

265-272. These Defendants are not a party to this Count and therefore no answer is required to the paragraphs pertaining to it.

COUNT 9

273-276. These Defendants are not a party to this Count and therefore no answer is required to the paragraphs pertaining to it.

COUNT 10

277-287. These Defendants are not a party to this Count and therefore no answer is required to the paragraphs pertaining to it.

COUNT 11

288-300. These Defendants are not a party to this Count and therefore no answer is required to the paragraphs pertaining to it.

COUNT 12

301-307. These Defendants are not a party to this Count and therefore no answer is required to the paragraphs pertaining to it.

COUNT 13

308. These Defendants incorporate by reference the above answers as if fully set forth herein.

309. Denied.

310. Denied.

311. Denied.

312. Denied.

313. Denied.

314. Denied.

COUNT 14

315-320. These Defendants are not a party to this Count and therefore no answer is required to the paragraphs pertaining to it.

Michael J. Baxter /s/

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Attorneys for Defendants
Russell Alexander, M.D., and David Fowler,
MB.,ChB., in their individual capacities

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this **16TH day of February 2022**, the foregoing Answer to Amended Complaint and Demand for Jury Trial by Defendants' Russell Alexander, M.D. and David Fowler, MB., ChB., in their individual capacities, was filed electronically via CM/ECF and served electronically and by first class mail, on:

<p>Deborah A. Jeon, Esq. Sonia Kumar, Esq. Tierney Peprah, Esq. American Civil Liberties Union of Maryland Foundation 3600 Clipper Mill Rd Ste 350 Baltimore, MD 21211 jeon@aclu-md.org tpeprah@aclu-md.org kumar@aclu-md.org</p> <p>Leslie David Hershfield, Esq. Schulman, Hershfield & Gilden, P.A. One East Pratt Street, Suite 904 Baltimore, MD 21202 lhershfield@shg-legal.com</p> <p>Kenneth W. Ravenell, Esq. Ravenell Law 711 Saint Paul Street Baltimore, MD 21202 kravenell@ravenelllaw.com</p> <p>Tomeka Grimes Church, Esq. The Law Office of Tomeka G. Church 711 Saint Paul St. Baltimore, MD 21202 tchurch@thechurchlawfirm.com</p>	<p>Daniel Karp, Esq. Karpinski, Cornbrooks and Karp, PA 120 East Baltimore Street, Suite 1850 Baltimore, MD 21202 brunokarp@bkcklaw.com <i>Attorneys for Defendant Michael Petyo and Jeannette L. Cleveland a/k/a Jeannette L. Delude</i></p> <p>Patrick Dugan McKevitt, Esq. Whiteford Taylor and Preston LLP Seven Saint Paul St. Baltimore, MD 21202 pmckevitt@wtplaw.com <i>Attorney for Defendant Dennis Lannon</i></p> <p>Matthew Douglas Peter, Esq. Local Government Insurance Trust 7225 Parkway Dr Hanover, MD 21076 MPETER@LGIT.ORG <i>Attorneys for Defendant Town of Centreville</i></p> <p>Raymond R. Mulera, Esq. LGIT, Educational Affairs Division 7225 Parkway Drive Hanover, MD 21076 rmulera@lgit.org <i>Attorneys for Defendant Town of Ridgely</i></p>
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Michael J. Baxter /s/

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